

Valdez, Heather

From: Valdez, Heather
Sent: Monday, August 12, 2013 10:07 AM
To: Johnson, Steffan
Subject: RE: Revised Petition Pursuant to 40 CFR 60.2115

Categories: Pogo FOIA

Thanks so much Stef.

In case they would like to put their meeting with us off until you are available, when would you be back from leave?

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R10 RICE Website, Engine Compliance Assistance  
[http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice\\_rules](http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules)

Boiler Area Source Compliance Assistance  
<http://www.epa.gov/boilercompliance/>

Department of Energy Website on Energy Assessments  
[http://www1.eere.energy.gov/manufacturing/tech\\_deployment/energy\\_assessment.html](http://www1.eere.energy.gov/manufacturing/tech_deployment/energy_assessment.html)

Non-Hazardous Secondary Materials  
<http://www.epa.gov/epawaste/nonhaz/define/index.htm>

Combustion Regulatory Actions  
<http://www.epa.gov/airquality/combustion/actions.html>

Boiler TTN Page  
<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>

RICE TTN Page  
<http://www.epa.gov/ttn/atw/rice/ricepg.html>

Combustion Portal (compliance assistance for combustion regulations)  
<http://www.combustionportal.org/>

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**From:** Johnson, Steffan  
**Sent:** Friday, August 09, 2013 11:22 AM  
**To:** Valdez, Heather  
**Cc:** Schell, Bob; Cozzie, David; Jones, Toni; Pavitt, John; Venus, Shirin; Hedgpeth, Zach  
**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

Heather,

I have reviewed the recent petition you have attached and provided some comments in the file attached to this e-mail.

Regarding the operating limits, overall I think they are pretty close, but there are some details I think you will want to nail down a bit further. KEY to me is the fuel composition question, and you will see that in the attachment.

Presumably, if they feel that they can operate without controls the results from their recent test indicate compliance and the documentation is sufficient to establish these operating parameters...

I go on leave on Aug 21, so please let me know if you have questions, comments, or other concerns prior to that date; I'm happy to chip in where I can be of assistance.

Best regards,

Stef

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**From:** Valdez, Heather

**Sent:** Thursday, August 08, 2013 11:58 AM

**To:** Hedgpeth, Zach; Jones, Toni; Johnson, Steffan; Pavitt, John; Venus, Shirin

**Subject:** FW: Revised Petition Pursuant to 40 CFR 60.2115

Hi, I just received this. I haven't had time to look at this yet, but it looks they think they can proceed without controls, because that is the only time this petition would be called for.

Zach and John, are you available during the times they suggest for a meeting.

Stef, I am thinking that it would be good to have you on the phone for the meeting they are requesting to discuss technical details, if you are willing.

Toni, would you be interested if the timing works for you?

Shirin, they say they would like to follow up with a counsel meeting after the technical meeting. The first day could work for you but the second would not. If it doesn't work for you to be there, I will tell them we may need to follow up with a call. I think we would still hold off on talking to John Keenan until we find out if they say they will need until next year to comply.

Can anyone think of anyone else I should try and include in the meeting with Pogo?

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From: Sally McLeod [<mailto:Sally.Mcleod@smmpogo.com>]

Sent: Tuesday, August 06, 2013 7:17 PM

To: Valdez, Heather; john.kuterbach@alaska.gov

Cc: Michael Short; Hunter, Jeffrey (Perkins Coie); Rosburg, John; Chris Kennedy

Subject: Revised Petition Pursuant to 40 CFR 60.2115

Heather,

Attached is Pogo's revised Petition. A hard copy will be certified mailed to the Director tomorrow.

Pogo would like to set up a meeting with you in Seattle. Would August 22 or 28 work?

The purpose of the meeting would be to present the results of our first incinerator stack test and discuss options for controls.

Both our stack test contractor and AQ specialist could be present. Therefore the focus would be technical discussion.

If needed, we'd like to follow up with a brief meeting with counsel to discuss Pogo's path forward.

Please give me a call if you wish to discuss.

Sally S. McLeod, CEM, REM

Environmental Manager

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